



September 19, 2019

Letter of Appeal – CC Docket No. 02-6  
FCC Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
<https://www.fcc.gov/ecfs/filings>

RE: Request for review of the denial of USAC appeal #146810. The appeal was filed for denied funding on FCDL for Form 471 Application 191008737, Funding Request 1999010492. (FCDL dated 04/27/2019 – RFCDL dated 9/18/2019)

**Message:**

1. Billed Entity:

St. Joseph County Public Library  
BEN 130399  
Form 471 Application 191008737  
FRN: 1999010492

E-Rate Contact:

Generex Consulting  
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2. This is an appeal of the denial for funding due to a service provider billing error. The denial states that we requested that a new funding request be added to this application and that new funding requests cannot be submitted through the appeals process and after the issuance of the FCDL.
3. Request for review:  
St. Joseph County Public Library signed an agreement with Maple Net Wireless dated 4/09/2015, (EPC Contract ID 114782) for WAN Service, with a term of 60 months. (Contract end date 6/30/2021) Form 470 #170082099 was filed to increase WAN speeds to 3 eligible entities. After the 28 day waiting period, an addendum to the existing contract was signed on 5/11/2017 (EPC Contract ID 19446) to increase the WAN speed for 3 eligible entities. The monthly recurring contracted cost increased \$3000.00 per month beginning in FY2017.
4. The post Commitment Rationale states: Your appeal has been denied. During appeal review of your FCC Form 471 #191008737 you requested that a new funding request be added to your application. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding request) until an Funding Commitment Decision Letter (FCDL) is issued. New funding requests cannot be submitted through the appeals process and after the issuance of the FCDL. Your appeal requests additional funds that were not included in the FCC Form 471 that you are appealing
5. FY2019 Form 471 was filed and certified 2/5/2019. The Funding Commitment Decision Letter is dated 4/27/2019. We received the email from Maple Net Wireless on 5/17/2019. Our funding request was based on the invoiced amount as we didn't want to request funding that we weren't using. Because the FCDL was received before we were told there was a billing issue, we were unable to correct the funding amount to match the contracted rates.

6. The service provider was questioned several times about the invoiced amount however, the invoices remained the same at \$10,000.00 per month and is what the Library system paid. FY2018 E-Rate funding request was filed with contracted rates. Since the invoices remained consistent throughout FY2018, we chose to file FY2019 Form 471 using the invoiced amount. St. Joseph County Public Library has been asked to pay the shortage in billing back to July 1, 2017.
7. The service provider, Maple Net Wireless opened Customer Service Case #275009 as stated in the email to us. We filed appeals with USAC for both FY2017 (Appeal #146808) and FY2019 (Appeal #146810). We asked that the funding request be increased to the contacted amount of \$13,000.00 per month.
8. Attached documents which support the request for review:
  - Copy of Email from Maple Net Wireless 5/17/2019
  - Copy of Email from USAC to Maple Net Wireless Customer Service Case #275009 5/17/2019
  - Copy of Funding Commitment Decision Letter 4/27/2019
  - Copy of denied USAC denied Appeal submitted 5/28/2019
  - Copy of Revised Funding Commitment Decision Letter 9/18/2019

Thank you for your consideration of this appeal.  
Respectfully submitted,



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Tammy Condon, E-Rate contact for St. Joseph County Public Library